

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
5:19-cv-00467-BO

JUSTIN J. WHITE,

Plaintiff,

v.

VANCE COUNTY, NORTH CAROLINA;  
VANCE COUNTY SHERIFF'S OFFICE;  
PETER WHITE, in his official and individual  
capacities; LAWRENCE D. BULLOCK, in his  
official and individual capacities;  
WELDON WALLACE BULLOCK, in  
his official and individual capacities,  
and WESTERN SURETY COMPANY  
a division of CNA SURETY,

Defendants.

**NOTICE PURSUANT TO**  
**LOCAL RULE 40.3**

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NOW COME the defendants, by and through counsel, and, pursuant to Local Rule 40.3, inform the Court of a related case as follows:

1. On October 22, 2021, the case of *Latwanya Oliver v. Justin J. White, in his individual capacity; Vance County Sheriff Curtis R. Brame, and Western Surety Company*, No. 5:21-CV-434-FL, was filed in this Court. In said case, the undersigned represents Vance County Sheriff Curtis R. Brame, who is sued only in his official capacity and only because, according to paragraph 3 of said Complaint, he currently holds the office previously occupied by former Sheriff Peter White.

2. These cases are related because they involve Justin J. White, who is a plaintiff in the case at bar and a defendant in the *Oliver* case, and former Sheriff White, who is a defendant in the case at bar and whose actions are alleged in support of the claims by the plaintiff in the *Oliver*

case; and because they involve some of the same facts and issues. Specifically, the plaintiff in the case at bar alleges that he was unlawfully fired after using force on Ms. Oliver and the defendants maintain that the plaintiff was fired for using excessive force on Ms. Oliver, who has now sued Justin J. White and the sheriff for excessive force and related claims. Thus, the cases involve some of the “same parties, transaction(s) or event(s),” as set out by Rule 40.3(a).

3. The defendants in the *Oliver* case have not been served yet, but will inform the Court in that case of this related case at the appropriate time.

Respectfully submitted, this 16<sup>th</sup> day of November, 2021.

/s/ Christopher J. Geis  
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*Attorneys for Defendants*

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he is an attorney at law licensed to practice in the State of North Carolina, is attorney for defendants in this matter, and is a person of such age and discretion as to be competent to serve process.

I hereby certify that on November 16, 2021, I electronically filed the foregoing **NOTICE PURSUANT TO LOCAL RULE 40.3** with the Clerk of the Court using the CM/ECF system, which will send notification of such to the following CM/ECF participant:

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